

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE GEISINGER SYSTEM  
SERVICES AND EVANGELICAL  
COMMUNITY HOSPITAL  
HEALTHCARE WORKERS  
ANTITRUST LITIGATION

No. 4:21–cv–00196

Chief Judge Matthew W. Brann

**PLAINTIFFS’ MOTION TO EXCLUDE AN OPINION AND RELATED  
ANALYSES OF DR. LAURENCE BAKER**

Plaintiffs respectfully move to exclude an opinion and related analyses of Defendants’ expert, Dr. Laurence Baker. Specifically, the Court should exclude Dr. Baker’s wage suppression test, results, analyses, or resulting conclusions set forth at paragraphs 137 to 145 of the Expert Report of Laurence Baker, Ph.D. (March 8, 2024) (Further Corrected) and Exhibits 12-13 thereto.

In support of this motion, Plaintiffs rely upon the accompanying Memorandum of Law, the Appendix of Unpublished Opinions, and the proposed Order as well as the Declaration of Adam J. Zapala and Exhibits thereto concurrently submitted.

Pursuant to Local Rule 7.1, Interim Co-Lead Counsel for Plaintiffs and the Proposed Class certify they have sought concurrence in this motion from each Defendant (Geisinger System Services and Evangelical Community Hospital) and that it has been denied by each Defendant.

Dated: June 14, 2024

Respectfully submitted,

/s/ Adam J. Zapala

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**CERTIFICATE OF SERVICE**

I, Adam J. Zapala, hereby certify that on June 14, 2024, I filed a true and correct copy of the foregoing Plaintiffs' Motion to Exclude an Opinion and Related Analyses of Dr. Laurence Baker via ECF and mail to the Clerk of Court. I further certify that the same documents were served via email upon all counsel of record in this matter.

/s/ Adam J. Zapala

Adam J. Zapala